

THE HONORABLE _____

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PARS EQUALITY CENTER, et al.,

Plaintiffs,

v.

MIKE POMPEO, et al.,

Defendants.

No. 2:18-cv-1122

**DECLARATION OF JOHN DOE 1 IN
SUPPORT OF PLAINTIFFS' MOTION**

DECLARATION OF JOHN DOE 1

I, John Doe 1, upon my personal knowledge, hereby declare as follows:

1. I am a native-born United States citizen living in Marion County, Florida. I was born in Florida to Libyan parents and have lived in the United States for over 12 years.

2. My parents came to the United States on student visas in the 1980s and lived in the United States for about ten years, during which time they had me and my siblings and my father earned an MBA, a Master's degree in management information systems, and a Ph.D. in banking.

3. My parents moved back to Libya after my father completed his education in the United States. I went with them when they returned to Libya, when I was two years old.

4. I came back to the United States when I was nineteen, in 2005, and have lived here ever since. I attended college in the United States and I now work for a large telecommunications company.

1 5. My family and I are practicing Muslims.

2 6. My parents remained in Libya after I came back to the United States. In 2014, I
3 filed a petition with United States Citizenship and Immigration Services for immigrant visas
4 for them because their quality of life has been declining ever since the Arab Spring happened
5 in Libya in 2011. The country is politically unstable and it is not safe for them.

6 7. In January 2017, my parents appeared for their interviews in Morocco in
7 Casablanca.

8 8. At their interview, the consular officer asked for further supporting
9 documentation, such as original police records for my parents. I sent in everything the
10 consulate requested and followed up with the consulate in October to make sure they had
11 everything they needed to make a decision on my parents' visas.

12 9. When the consulate responded, they said yes, they required no further
13 information, and told me that my parents' case was in administrative processing.

14 10. In January 2018, I received an e-mail with a case status, saying that my
15 parents' visas had been refused under the Presidential Proclamation.

16 11. My parents and I were devastated by this news. Life is extremely difficult and
17 dangerous for them in Libya; it is hard to come by basic necessities, such as food, water, and
18 health care.

19 12. I want to bring them to the safety of the United States so that they can live with
20 me. It deeply pains me that I cannot support my parents as they are growing older.

21 13. In February of this year, I again checked the status of my parents' visas on the
22 website provided by the Department of State. This time, my mother's status was listed as
23 "refused." My father was listed as "in administrative processing."

24 14. I am fearful that my participation in this lawsuit against United States federal
25 government officials could jeopardize my parents' chances for a waiver and a visa. I do not
26 want my participation in this lawsuit to adversely impact my parents' chances of coming to
27 the United States.

1 15. I am also afraid that using my real name in this lawsuit would make it easy to
2 identify and target my parents, and would subject them to harassment and violence in Libya.
3 Many civilians have been kidnapped and held for ransom by militias who are looking for
4 families to extort.

5 16. In addition, I fear that if I use my name in this lawsuit against the Trump
6 Administration, the potential attention it might receive will expose me, and possibly my
7 siblings here in the United States, to harassment, discrimination, and physical harm. I am
8 aware that incidents of discrimination and violence against Muslim Americans have increased
9 ever since President Trump's inauguration.

10 17. For these reasons, I feel that my personal security and that of my family
11 necessitates that I be allowed to proceed under a pseudonym.

12 I declare under penalty of perjury and under the laws of the United States that the
13 foregoing is true and correct. Executed in Marion County, Florida on July 10th, 2018.



CERTIFICATE OF SERVICE

Pursuant to RCW 9A.72.085, the undersigned certifies under penalty of perjury under the laws of the United States and the laws of the State of Washington, that on the 31st day of July, 2018, the foregoing document was served on the following individuals in the manner set forth below: N/A

and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

Michael R. Pompeo c/o United States Department of State 2201 C Street NW, Room 4330, Washington DC 20037	Kirstjen Nielsen c/o United States Department of Homeland Security 3801 Nebraska Ave NW Washington DC 20016
Kevin McAleenan c/o United States Customs and Border Patrol 1300 Pennsylvania Ave. NW Washington, DC 20229	United States Department of Homeland Security 3801 Nebraska Ave NW Washington DC 20016
United States Department of State 2201 C Street NW, Room 4330, Washington DC 20037	United States Customs and Border Protection 1300 Pennsylvania Ave. NW Washington, DC 20229

Executed on the 31st day of July, 2018, at Seattle, Washington.

s/ Jessica Walder
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